

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

OCT 1 2015

UNITED STATES OF AMERICA

v.

MARSHALL THOMAS

§
§
§
§
§

David J. Bradley, Clerk of Court

CRIMINAL NO. H-15-535

INDICTMENT

THE GRAND JURY CHARGES THAT:



INTRODUCTION

At all times relevant to this indictment:

1. Defendant, MARSHALL THOMAS, was an employee working as a correctional officer for the Federal Bureau of Prisons at the Federal Prison Camp in Bryan, Texas, in the Southern District of Texas.

2. The Department of Justice, Office of the Inspector General ("OIG") was conducting a federal criminal investigation into allegations that defendant, MARSHALL THOMAS, committed one or more federal violations while on duty as a correctional officer at the Federal Prison Camp.

COUNT ONE

In or about July 2014, at the Federal Prison Camp, located in Bryan, Texas, within the Southern District of Texas, defendant, MARSHALL THOMAS, a correctional officer at the Federal Prison Camp, a Federal Prison, did knowingly engage in or cause sexual contact with "S.R.," by intentionally touching the breast of "S.R." with an intent to abuse, humiliate, harass,

degrade, or arouse or gratify the sexual desire of any person, At the time of the sexual contact “S.R.” was in official detention at the Federal Prison Camp, and under the custodial, supervisory or disciplinary authority of MARSHALL THOMAS.

In violation of Title 18, United States Code, Section 2244(a)(4).

COUNT TWO

On or about July 19, 2014, at the Federal Prison Camp, located in Bryan, Texas, within the Southern District of Texas, defendant, MARSHALL THOMAS, a correctional officer at the Federal Prison Camp, a Federal Prison, did knowingly engage in a sexual act with “S.R.” by having the mouth of “S.R.” contact the penis of MARSHALL THOMAS. At the time of the sexual act, “S.R.” was in official detention at Federal Prison Camp, and under the custodial, supervisory or disciplinary authority of MARSHALL THOMAS.

In violation of Title 18, United States Code, Section 2243 (b).

COUNT THREE

On or about July 19, 2014, at the Federal Prison Camp, located in Bryan, Texas, within the Southern District of Texas, defendant, MARSHALL THOMAS, a correctional officer at the Federal Prison Camp, a Federal Prison, did knowingly engage in a sexual act with “S.R.” by having the vulva of “S.R.” contact the penis of MARSHALL THOMAS. At the time of the sexual act, “S.R.”, was in official detention at the Federal Prison Camp and under the custodial, supervisory or disciplinary authority of MARSHALL THOMAS.

In violation of Title 18, United States Code, Section 2243 (b).

COUNT FOUR

In or about June 2014, at the Federal Prison Camp, located in Bryan, Texas, within the Southern District of Texas, defendant, MARSHALL THOMAS, a correctional officer at the Federal Prison Camp, a Federal Prison, did knowingly engage in a sexual act with "E.C.," by penetrating the genital opening of "E.C." with the finger of MARSHALL THOMAS. At the time of the sexual act "E.C." was in official detention at the Federal Prison Camp, and under the custodial, supervisory or disciplinary authority of MARSHALL THOMAS.

In violation of Title 18, United States Code, Section 2243 (b).

COUNT FIVE

On or about July 19, 2014, at the Federal Prison Camp, located in Bryan, Texas, within the Southern District of Texas, defendant, MARSHALL THOMAS, a correctional officer at the Federal Prison Camp, a Federal Prison, did knowingly engage in a sexual act with "E.C.," by penetrating the genital opening of "E.C." with the finger of MARSHALL THOMAS. At the time of the sexual act "E.C." was in official detention at the Federal Prison Camp, and under the custodial, supervisory or disciplinary authority of MARSHALL THOMAS.

In violation of Title 18, United States Code, Section 2243 (b).

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By: 

Ruben R. Perez
Assistant United States Attorney

By: 

Jill Stotts